

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAIMARIA BODOR,
individually and on behalf of all
others similarly situated,

Plaintiff,

v.

MAXIMUS FEDERAL SERVICES, INC.,

Defendant.

Civil Action No. 5-19-cv-05787-JMG

**PLAINTIFF’S CONSENTED TO MOTION
FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff respectfully requests leave to file a First Amended Complaint. The parties have met and conferred with regards to this matter and Defendant has consented to this motion in writing.

Paragraph 1 of the Court’s Scheduling Order, dated April 10, 2020 (Docket No. 26), provides that all motions to amend the Complaint in this action be filed on or before May 5, 2020. On May 5, 2020, counsel for Plaintiff shared the proposed Amended Complaint (attached hereto as Exhibit “1”) with counsel for Defendant who requested time to review the new pleading before Plaintiff submitted it to the Court. Plaintiff therefore chose to hold off on filing what at that time would have been a contested motion to amend. Following review, the parties reached agreement on both filing the new complaint after the deadline stipulated by this Court and on the amendment itself. Moreover, Defendant will not be prejudiced by the amendment. Discovery has just commenced and the new complaint maintains the same parties, counts, and relief sought as the original Complaint.

Defendant has requested and Plaintiff has no objection to a period of 21 days from the docketing of the Amended Complaint for Defendant to file its response.

A proposed form of Order is submitted herewith.

Wherefore, Plaintiff respectfully requests that the Court grant Plaintiff's Consented to Motion to File a First Amended Complaint.

Respectfully submitted,

Date: 5/13/20

/s/ Cary L. Flitter

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COUNSEL FOR PLAINTIFF

*Pro Hac Vice Application
Approved
**Proc Hac Vice Application
Forthcoming

CERTIFICATION IN LIEU OF BRIEF

Pursuant to E.D. Local Rule 7.1, I certify that the within motion is a routine and consented-to application and no memorandum of law is necessary.

Date: 5/13/20

/s/ Cary L. Flitter
CARY L. FLITTER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Consent Motion for Leave to File First Amended Complaint was served on this date to all parties of record as follows:

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Date: 5/13/20

/s/ Cary L. Flitter
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